

REMARKS

In light of the above the amendatory matter and remarks to follow, reconsideration and allowance of this application are respectfully solicited.

Claims 57-63 remain in this application. Claims 57-63 are amended to clarify the distinctions between Applicants' claims and the cumulative teachings of Enami, Seki, Delpuch (newly cited U.S. Patent 7,069,579), Kinney (newly cited U.S. Patent 5,808,662), Farmer (newly cited U.S. Patent Publication 2005/0055239) and Lahey (newly cited U.S. Patent Publication 2005/0228711).

Enami describes a video production system having a number of multimedia computer terminals that share information used for the production of a video program. As the Examiner found, Enami does not contemplate composition table providing apparatus; and it is not clear if Enami describes a composition table.

Seki appears to be directed to a technique for integrating a word-formatted document with an image (see, for example, col. 2, lines 16-41 of Seki). An image capture guide list includes shooting instruction information consisting of text, graphics, a voice memo and a motion picture (col. 3, lines 27-38). Figs. 3A and 3B illustrate an item list and Figs. 7A and 7B and 89 illustrate an image capture guide list. There appears to be no description of a system in which different operating groups communicate, by way of their respective terminals, with composition table providing apparatus for the coordination and performance of successive tasks by these groups, especially when the task of one group relies upon the completion of the task performed by another.

Delpuch describes an on-demand interactive video magazine. Storage devices 18 are external to a set-top box 16 to store programs that will not fit in the main memory in the set-top

box (col. 6, lines 23-37 of Delpuch). Programs stored in storage device 18 are associated with identifying information from the original signaling information, and the identifying information allows the viewer to retrieve a particular program or clip (col. 7, lines 24-37). There is no description in Delpuch of a video program production system, composition table providing apparatus or a plurality of operating group terminals that communicate with the composition table providing apparatus for the coordination and performance of tasks required for the production of a video program.

Kinney describes interactive playback of a movie from different terminals, allowing participants to view each other's notes (col. 2, lines 5-29 of Kinney). Although Kinney was cited for allegedly describing edit operations, it is respectfully submitted that Kinney permits a given participant to play the movie at different speeds, but there is no suggestion of editing that movie (see, for example, col. 6, lines 25-20, which refers to "non-destructive annotations").

Farmer is directed to an aircraft maintenance system in which a database supplies maintenance function information to an electronic package that is printed out for maintenance personnel to perform specific tasks. Once a task is completed and approved by a manager, information on that task is stored. When a worker logs into a terminal and enters his ID, a maintenance server determines the task for which that worker is certified to perform, and the electronic package delineating the task is displayed on the worker's terminal (paragraph [0032] of Farmer). An electronic record of the work that is completed and authorized is maintained (Fig. 4 and paragraphs [0049], [0050] and [0053]). There is no suggestion of displaying the electronic package or the electronic record to all terminals.

Lahey describes a workflow management system in which a job status table is maintained to indicate the status of jobs performed by different workers. The output status of a job

performed by one worker is the input status for the next worker (paragraphs [0057] and [0059] of Lahey). It appears that a supervisor controls the workflow to different workers (paragraphs [0062] and [0065]).

It is respectfully submitted, the cumulative teachings of the references discussed above fail to enable one of ordinary skill in the art to make and use the subject matter defined by Applicant's claims. Claims 57-60 are directed to a video program production system having plural terminals communicating with a composition table providing apparatus, and wherein the composition table is displayed at the terminals to identify tasks to be performed and tasks that are completed. Since all of the terminals display the composition table, all operating groups are readily apprised of a task that is completed, thus enabling the next following task to be performed. Claims 61-63 are directed to the terminals used in the video program production system. As a result, a complicated video production is easily coordinated among the various groups needed for the production. Some of the features of Applicant's claims that are not suggested by this prior art are listed below:

Claim 57:

a video program database for storing video program content data inputted from said program content gathering and program production terminals,

control means for providing the composition table data to each of the terminals for viewing at each terminal, and for processing information input from the terminals to be added to the composition table data;

wherein each terminal comprises:

... display means for displaying the composition table data acquired by the acquisition means, including the tasks to be performed and the tasks completed by respective groups,

input information transmitting means for transmitting the input information [from the terminal] to the composition table providing apparatus to update the composition table that is stored and displayed at the terminals,

whereby the display at a terminal of said end of task data in said composition table data instructs a group to perform the next successive task following the task that has been completed.

Claim 58:

an A/V database for storing audio and video content for said video program,

control means for providing the composition table data to the terminals for viewing at each terminal, and for processing information input from the terminals to be added to and update the composition table data

wherein each terminal comprises:

... display means for displaying the composition table data acquired by the acquisition means, including the A/V content gathering and editing tasks performed and completed by said operating groups, and for displaying said audio and video information when a link thereto in said composition table data is selected,

input information transmitting means for transmitting the input information to the composition table providing apparatus to update the composition table that is stored and displayed at the terminals,

whereby the display at a terminal of information in said composition table data representing the completion of a task by one group instructs another group to perform the next successive task following the task that has been completed.

Claim 59:

a video program database for storing video program content data inputted from said program content gathering and program production terminals,

control means for providing the composition table data to each of the terminals for viewing at each terminal, and for processing said certain predetermined updatable items, input from the terminals of those authorized operating groups, to be added to the composition table data,

wherein each terminal comprises:

... display means for displaying the composition table data ... including the tasks to be performed and the tasks completed by respective authorized operating groups,

input information transmitting means for transmitting the updatable items to the composition table providing apparatus so as to update the composition table that is displayed at the terminals,

whereby the display at a terminal of said end of task data in said composition table data instructs a group to perform the next successive task following the task that has been completed.

Claim 60:

an A/V database for storing audio and video information content for said video program,

control means for providing the composition table data to each of the terminals for viewing at each terminal, and for updating said composition table data with information input from at least some of the terminals;

wherein each terminal comprises

... display means for displaying the composition table data acquired by the acquisition means, including the A/V content gathering and editing tasks performed and completed by said operating groups,

transmitting means for transmitting the edit information and end of task data to the composition table providing apparatus for updating said composition table data that is stored and displayed at the terminals,

whereby the display at a terminal of information in said composition table data representing the completion of a task by said edit operating group, instructs another group to perform the next successive task following the task that has been completed by said edit operating group.

Claim 61:

A terminal for use by a respective operating group in a video program production system to communicate with a composition table providing apparatus ... comprising:

display means for displaying the acquired composition table, including the tasks to be performed and the tasks completed by respective groups,

input information transmitting means for transmitting the input information to the composition table providing apparatus to update the composition table at the composition table providing apparatus and displayed on the terminals used by the groups,

whereby the display at a terminal of said end of task data in said composition table instructs a group to perform the next successive task following the task that has been completed.

Claim 62:

A terminal for use by a respective one of several operating group groups in a video program production system to communicate with a composition table providing apparatus ... comprising:

acquisition means for acquiring a composition table containing information describing successive tasks to be performed and completed by at least said program content gathering and program production groups required for the production of said video program ... ,

display means for displaying the acquired composition table, including the tasks to be performed and the tasks completed by respective authorized operating groups,

input information transmitting means for transmitting the updatable items to the composition table providing apparatus for updating the composition table that is displayed on the terminals used by the groups,

whereby the display means at said terminal displays the completion of a task performed by one operating group to instruct another operating group to perform the next successive task following the task that has been completed.

Claim 63:

A terminal for use by an edit operating group in a video program production system to communicate with a composition table providing apparatus and with an audio/video (A/V) database, said terminal comprising:

acquisition means for acquiring a composition table containing updatable information describing (A/V) gathering and editing tasks to be performed and completed by at least A/V content gathering and A/V editing operating groups required for the production of a video program, said composition table further containing links to audio and video information in said A/V database,

display means for displaying the acquired composition table, including the A/V content gathering and editing tasks performed and completed by said A/V content gathering and A/V editing operating groups,

means for performing an edit operation on at least said retrieved video information in accordance with said information in said displayed composition table describing said editing tasks, thereby producing edited video information,

edit information generating means for generating edit information describing said edit operation to be input to said composition table and end of task data representing the completion of the task performed by the edit operating group, and

transmitting means for transmitting the edit information and end of task data to the composition table providing apparatus for updating said composition table,

whereby the display means at said terminal displays the completion of a task performed by the edit operating group to instruct another operating group to perform the next successive task following the task that has been completed.

It is further noted the respective references which have been combined and applied against the claims of the present application are from disparate, unrelated arts. There is no motivation, suggestion or underlying reason to combine the video production system of Enami with the image capturing listing of Seki with the interactive video magazine of Delpuch with the interactive movie playback arrangement of Kinney with the aircraft maintenance system of Farmer with the supervisory-controlled workflow of Lahey. At best, six unrelated references must be combined in order to reject Applicant's amended claims. But there is no reason to combine these references in the manner attempted in the office action under reply.

It is respectfully submitted the Examiner has used Applicant's claims as a guide to reconstruct the prior art by assembling individual, unrelated bits and pieces. It is improper to use the hindsight gained from Applicant's specification, and then use that hindsight to reassemble the prior art in an effort to reject Applicant's claims. The only motivation to use these references in

the manner attempted by the Examiner is provided solely by Applicant himself. The Court of Appeals for the Federal Circuit, as well as its predecessor court, has long held that obviousness cannot be established by combining the teachings of the prior art to produce the claimed invention, absent some teaching, suggestion or incentive supporting the combination. Although *KSR* has relaxed the standard for combining multiple references, it still is impermissible to use Applicant's claims as a frame and the prior art references as a mosaic to piece together a facsimile of the claimed invention. But that is precisely what has been done in the present case. Accordingly, the rejection of claims 57-63 should be withdrawn.

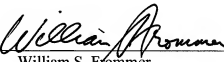
Since the cumulative teachings of the prior art that has been applied against Applicant's claims fail to disclose all of the limitations recited by those claims, claims 57-63 are unobvious and are in condition for allowance.

Statements appearing above in respect to the disclosures in the cited references represent the present opinions of the undersigned attorney and, in the event the Examiner disagrees with any of such opinions, it is respectfully requested that the Examiner specifically indicate those portions of the references providing the basis for a contrary view.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

Respectfully submitted,

FROMMER LAWRENCE & HAUG LLP
Attorneys for Applicant

By: 
William S. Frommer
Reg. No. 25,506
Tel. (212) 588-0800